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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

IN RE GARY HUNT,

Case No.: 3:16-cr-00051-BR

**MOTION FOR REVOCATION OF
DETENTION ORDER**

The defendant, through his appointed counsel, Assistant Federal Public Defender Douglas Beevers of the Eastern District of California, with the assistance of Chief Deputy Federal Public Defender Stephen Sady of Oregon Federal Public Defender's office, respectfully moves this Court pursuant to 18 U.S.C. § 3145(b) for an order revoking the detention order entered in the Eastern District of California on March 31, 2017, in *United States v. Hunt*, 2:17-mj-00058-EFB, on the grounds that conditions can be fashioned to assure Gary Hunt's appearance in this Court as directed and that there are no issues of public safety in this case.

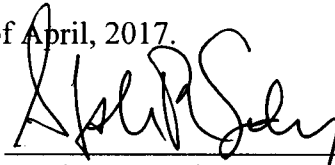
Mr. Hunt was arrested based on a warrant from the District of Oregon with failing to respond to an Order to show cause in a context involving significant issues of jurisdiction and the First Amendment. *See United States v. Patrick, et al.*, No. 3:16-cr-000512-BR, docket entry 2017 (filed Mar. 10, 2017). After he was arrested in California, he attempted to be interviewed by the Pretrial Services Office but, apparently because the matter was not clearly criminal, no interview was conducted. Mr. Hunt is a 71-year-old Vietnam veteran who is a retired professional surveyor. He has no prior criminal history and has stable long-term connections to his community, including residence in the same house for 14 years. He has represented and continues to represent to the Court that he will comply with the requirement that he appear in Portland, Oregon, for his appearance in federal court.

Prior to his first appearance in California, Mr. Hunt did not have the advice of counsel regarding this matter. Now that he has representation, he intends to work with counsel to assert his legal positions that question the authority of the government to proceed against him and that assert the full range of applicable constitutional and statutory protections on individual rights. He understands through his California counsel that the Oregon office of the Federal Public Defender represents a defendant in the underlying *Bundy* case and may have a conflict. He further understands that the assistance of the Oregon Federal Public Defender's office is limited to urgent preliminary matters in furtherance of his release and his request for appointment of conflict-free counsel to act as his attorney under the Criminal Justice Act for future representation.

On the basis of the foregoing, Mr. Hunt respectfully requests that the Court revoke the detention order and order him immediately released on his own recognizance or on conditions.

Pursuant to § 3145(b), he requests that “the motion shall be determined promptly.” The government, through AUSA Pamala Holsinger, opposes this motion.

Respectfully submitted this 6th day of April, 2017.

A handwritten signature in black ink, appearing to read "Stephen R. Sady", written over a horizontal line.

Stephen R. Sady
Chief Deputy Federal Defender

Susan F. Wilk
Assistant Federal Public Defender